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10 INTERIOR TRASPORT and JEFFREY  
STEVEN HELMBERGER  
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12  
13 **IN THE UNITED STATES DISTICT COURT**  
14 **FOR THE EASTERN DISTRICT OF CALIFORNIA**

15  
16 DENEANE LOUISE WILLIAMS,

17 Plaintiff,

18 vs.

19 SYSTEM TRANSPORT, INC., d.b.a.  
20 INTERIOR TRANSPORT; JEFFREY  
STEVEN HELMBERGER,

21 Defendant.

No.: CIV. S-05-324 GEB DAD

**STIPULATION AND ORDER TO EXTEND  
EARLY NEUTRAL EVALUATION  
COMPLETION DATE**

22 COMES NOW plaintiff DENEANE LOUISE WILLIAMS, and defendants SYSTEM  
23 TRANSPORT INCORPORATED, d/b/a INTERIOR TRANSPORT, their attorneys of record,  
24 the undersigned, and hereby request that the early neutral evaluation completion date  
25 be extended to October 31, 2005 for the following reasons:  
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1. On June 10, 2005, the parties conducted a telephone conference with Gerald J. Adler, Esquire, who is the chosen neutral evaluator, wherein the parties discussed procedures for the early neutral evaluation scheduled for August 18, 2005.

2. Both parties were to have depositions completed in preparation of the early neutral evaluation before August 18, 2005, but due to a calendaring error, the depositions of Dr. William Duffy and defendant Jeffrey Steven Helmberger had not been scheduled in time.

3. Plaintiff's counsel contacted the chosen neutral evaluator Gerry Adler, and advised of this error. Mr. Adler advised that the completion date for the early neutral evaluation is August 29, 2005, following which contact with the court was to be made no later than September 1, 2005 as to the outcome of the early neutral evaluator.

4. Defendant's counsel has now scheduled the deposition of Dr. William Duffy for September 28, 2005, at 5:00 p.m.

5. Plaintiff's counsel is coordinating a date with defendant's counsel to schedule the deposition of Jeffrey Steven Helmberger, for a date prior to that of Dr. Duffy's deposition.

6. Both parties have completed the initial disclosures and written discovery and plaintiff's deposition has also been completed.

7. For these reasons, the parties request that the early neutral evaluation completion date be extended to such a time so as to allow the parties to receive the necessary deposition transcripts by extending the completion date of October 31, 2005.

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2 DATED: SEPTEMBER \_\_\_\_\_, 2005

VANTASSELL, FORNASERO &  
WAGSTAFFE, LLP

3 BY: \_\_\_\_\_

4 PAUL J. WAGSTAFFE  
5 Attorneys for Plaintiff  
DENEANE LOUISE WILLIAMS

6 DATED: SEPTEMBER \_\_\_\_\_, 2005

DIEPENBROCK & COTTER, LLP

7  
8 BY: \_\_\_\_\_

9 JOHN P. COTTER  
10 Attorneys for Defendants  
11 SYSTEM TRANSPORT, INC., d.b.a.  
INTERIOR TRANSPORT  
And JEFFREY STEVEN HELMBERGER

12 As the early neutral evaluator, I consent to the above request to extend the early  
13 neutral evaluation completion date to October 31, 2005.

14 DATED: September \_\_\_\_\_, 2005

15  
16 \_\_\_\_\_  
17 GERALD J. ADLER

18  
19 **ORDER**

20 Based on the stipulation of the parties and good cause appearing, it is hereby  
21 ordered that the early neutral evaluation completion date be extended no later than  
22 October 31, 2005.

23 DATED: September 14, 2005

24 /s/ Garland E. Burrell, Jr.  
25 GARLAND E. BURRELL, JR.  
26 United States District Judge